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7
8 UNITED STATES BANKRUPTCY COURT
9 EASTERN DISTRICT OF CALIFORNIA

10
11 In re: Case No. 13-15341-A
12 Forest Lee Johnson, III Chapter 13
13 Deneice Renee Johnson
14 Debtors.

15
16 _____ DC No. GMA-2
17 Forest Lee Johnson, III
Deneice Renee Johnson

18 Movants
19 Department A
20 vs. Courtroom 11
2500 Tulare Street,
Fresno, CA

21 Chase,
22 Respondent. Date: September 12, 2013
Time: 9:00 am

23 _____
24 MOTION FOR VALUATION OF COLLATERAL
AND FIXING OF SECURED CLAIM

25
26 Come now Debtors, Forest Lee Johnson, III and Deneice
27 Renee Johnson, and allege as follows:

28 1. This motion is filed under 11 U.S.C. 506 to obtain an

1 order fixing the value of collateral held by creditor.

2 2. Debtors are the owners of real property located at
3 1799 W. Rio Hondo Court, Hanford, CA more particularly known
4 as follows:

5 Lot 44 of Ashton Park Unit No.1, County Tract No. 776,
6 in the city of Hanford, County of Kings State of
7 California, according to the map thereof recorded in
8 Volume 19, Page 57 of Licensed Surveyor Plats, Kings
County Records.

9 The property is subject to a lien held by Chase.

10 3. Debtors have filed a Chapter 13 Plan in which the
11 creditor is to receive the amount of its secured claim.

12 4. The replacement value of the real property for
13 purposes of 11 U.S.C. 506 and 11 U.S.C. 1322(b) is
14 \$225,000.00.

15 5. The real property is subject to liens and
16 encumbrances which are prior in right to the claim of the
17 Respondent herein and which exceed the value of the real
18 property.
19

20 6. The secured claim of the Respondent, Chase, is \$-0-.

21 7. Any objections to the creditor's claim are reserved.

22 WHEREFORE, Debtors pray the Court enter its order
23 determining the value of the collateral and fixing the
24 creditor's secured claim at \$-0-.

25 Dated: August 6, 2013

26
27 /s/ Geoffrey M. Adalian
Geoffrey M. Adalian
28 Attorney for Debtors